

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

PUBLIC NOTICE OF INTENT TO MODIFY A WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM (WPDES) PERMIT NO. WI-0003620-08-1

Permittee: Domtar A W LLC, 301 Point Basse Ave, Nekoosa, WI, 54457-1026

Facility Where Discharge Occurs: Domtar - Nekoosa, 301 Point Basse Ave., Nekoosa, WI and Wastewater Reclamation Center, 405 Church Ave., Nekoosa, WI

Receiving Waters: Wisconsin River, groundwaters in Wood County, and land application sites in Adams, Juneau, Portage, Waushara, and Wood Counties

Discharge Location:

Outfall 002: Submerged and located just north of the Wastewater Reclamation Center at 44° 20' 0" N 89° 53' 0" W

Outfall 005: SW 1/4, SW 1/4, Section 31, T22N, R6E, Town of Grand Rapids, Wood County

Outfall 006: Below the Nekoosa Mill at 44° 18' 45" N 89° 53' 45" W

Outfall 008: Below the Nekoosa Mill

Outfall 010: On DNR approved land application sites in the state of Wisconsin

Outfall 011: East of Nekoosa Dam across the Wisconsin River from the Nekoosa Mill.

Brief Facility Description: Domtar A. W. LLC (Domtar) operates an integrated Kraft pulp and paper mill in Nekoosa which is capable of producing 600 tons per day of air dried kraft pulp and 600 tons per day of finished paper. Paper is made by using kraft pulp produced at the facility from raw logs, purchased wood chips, bleached pulp purchased from other mills, broke and recycled paper. The final products from the facility are rolls of paper. The Nekoosa bleach plant has been elemental chlorine free (ECF) since mid-1998.

The Nekoosa Mill utilizes cooling water and process water from 2 water intakes; Nepco Lake and Wisconsin River. Water that is not used in the papermaking process and utilized for cooling, discharges through Outfall 006 to the Wisconsin River. The mill does have an emergency outfall for the mill's main collection tank to Wisconsin River (Outfall 008). Outfall 011 is an outfall of Nepco Lake water with an intermittent discharge for the purpose of equalizing water pressure levels to the mill; this standpipe outfall discharges to the Wisconsin River. The Nekoosa mill discharges sanitary wastes to the Nekoosa municipal wastewater treatment plant.

Domtar treats water withdrawn from Nepco Lake for use by the Nekoosa mill. Intake water treatment consists of alum or alum plus polymer addition followed by solids settling in a baffled basin and screening before entering the mill. The settling basins are dredged every three to five years and dredged solids are placed into a dewatering basin. Decant from the dewatering basin flows back to the settling basins. Domtar hauls solids from the dewatering basin to one of its licensed landfills near the WRC. Neither the dewatering basin nor the settling basins are lined. However, sand is placed on the bottom of the dewatering basin. The permit classifies seepage from the alum sludge dewatering basin as a groundwater discharge via Outfall 005.

The Wastewater Reclamation Center (WRC) treats process wastewaters from the Nekoosa Mill, Nekoosa Coated Products, Inc, and site landfill leachates. The WRC is located between Port Edwards and Nekoosa. Process wastewaters including all vacuum pump seal waters from the Nekoosa mill, process wastewaters from Nekoosa Coated Products, ash-bark landfill leachate, and storm water. The treated wastewater is sent for final discharge to the Wisconsin River via Outfall 002. The WRC discharges its sanitary wastes to an on-site septic system. Sludges from the WRC are landspread via Outfall 010 on DNR approved sites or landfilled if field spreading demand is low.

The Wastewater Reclamation Center treats processed wastewaters from the Nekoosa Coated Products, Inc. (NCP). NCP facility has an off-machine paper coater that utilizes water-based materials for standard paper coatings and discharges between 15,600 to 21,800 gallons per day of wastewater into the process wastewater stream. Testing is done on the wastewater prior to coming into Nekoosa's Mill wastewater collection system.

Permit Drafter's Name, Address, Phone and Email: Trevor Moen, DNR, 625 E Cty Rd Y Suite 700, Oshkosh, WI, 54901, (920) 424-7883, Trevor.Moen@wisconsin.gov

Basin Engineer's Name, Address, Phone and Email: Peter Pfefferkorn, 473 Griffith Avenue, Wisconsin Rapids, WI 54494, (715) 421-7868, Peter.Pfefferkorn@wisconsin.gov

Proposed Modification Request: On December 7, 2020, Domtar submitted a request to the department to modify the WPDES permit. Domtar requested the following:

- Evaluate information from NCP regarding its past and present use of per- and polyfluoroalkyl substances (PFAS) containing coating materials and voluntary PFAS testing data for NCP and include a new in-plant sampling point for the process wastewater line from NCP. The PFAS test data included the Wisconsin 36 PFAS analytes. The testing was conducted at NCP's wastewater tank prior to release to the Nekoosa Mill's

wastewater treatment plant. Domtar also provided voluntary testing of PFAS at Outfall 002 that followed Wisconsin PFAS testing protocol.

- Evaluate final total phosphorus effluent limits based on the now approved Site-Specific Criteria (SSC) under the Wisconsin River Basin TMDL and include updated phosphorus multi-discharger variance (MDV) language based on the final derived TMDL limits using the approved SSC.

On February 2, 2021, Domtar requested that the permit modification also include the representative sampling method for Outfall 005 based on the Sampling Method Evaluation Report for Outfall 005 received on January 18, 2021 and approved on January 27, 2021.

On March 4, 2021, Domtar requested that the permit modification also include representative sampling of the WRC sludge. In support of that request, Domtar provided to the department on March 5, 2021, voluntary PFAS sampling of the WRC sludge conducted on November 20, 2020, that was analyzed and validated on January 27, 2021.

Proposed Modification Changes:

- Added new In-Plant Sampling Point 110 for the process wastewater from Nekoosa Coated Products under Section 2.1 and Section 2.2.5. Sampling Point 110 includes flow rate monitoring and sampling for 33 PFAS.
- The department has added annual sampling for 33 PFAS under Section 3.2.1 for Outfall 002 based on Wisconsin DNR PFAS Update-Default Reporting List for Sampling and Analysis Requirements and Expectations, as amended (current version dated March 1, 2021).
- The department updated the language under the MDV requirements in Section 3.2.1.14 to reflect the change in the target value from 0.2 mg/L to the final TMDL derived limit of 100 lbs/day.
- The department has added Section 3.2.1.17 explaining the TMDL limits for the facility and the how the MDV applies.
- The department has added Section 3.2.1.18 explaining what PFAS parameters are to be sampled and test methods to be used based on Wisconsin DNR PFAS Update-Default Reporting List for Sampling and Analysis Requirements and Expectations, as amended (current version dated March 1, 2021).
- The department has added a clarifying note for maximum temperature under Section 3.2.2 stating that the daily maximum limit of 120°F is effective for all months except for August and September. This exception was missed during the previous permit.
- The department updated the sampling point location and description based on the recommended sampling method for Outfall 005 under Section 4.1.
- The department removed monitoring for COD, dissolved copper, dissolved lead, and dissolved zinc under Section 4.2.1 for Outfall 005.
- The department has added annual sludge sampling for 33 PFAS under Section 5.2.1 for Outfall 010 based on Wisconsin DNR PFAS Update-Default Reporting List for Sampling and Analysis Requirements and Expectations, as amended (current version dated March 1, 2021).
- The department has added Section 5.2.1.6 to permit explaining what PFAS parameters are to be sampled and test methods to be used based on Wisconsin DNR PFAS Update-Default Reporting List for Sampling and Analysis Requirements and Expectations, as amended (current version dated March 1, 2021).

Note: For specific details and information about proposed changes from the previous permit, please see the permit modification fact sheet.

The Department has tentatively decided that the above specified WPDES permit should be modified.

Persons wishing to comment on or object to the proposed permit action, or to request a public hearing, may write to the Department of Natural Resources at the above-named permit drafter's address. Currently, DNR staff are working remotely and have very limited access to US mail. To ensure comments are received, the Department recommends that all comments be sent via email to the permit drafter listed in this notice. All comments or suggestions received no later than 30 days after the publication date of this public notice will be considered along with other information on file in making a final decision regarding the permit. Anyone providing comments in response to this public notice will receive a notification of the Department's final decision when the permit is issued. Where designated as a reviewable surface water discharge permit, the U.S. Environmental Protection Agency is allowed up to 90 days to submit comments or objections regarding this permit determination. If no comments are received on the proposed permit from anyone, including U.S. EPA, the permit will be issued as proposed.

The Department may schedule a public informational hearing if requested by any person and shall schedule a public informational hearing if a petition requesting a hearing is received from 5 or more persons or if response to this notice indicates significant public interest pursuant to s. 283.49, Stats. Requests for a public informational hearing

shall state the following: the name and address of the person(s) requesting the hearing; the interest in the proposed permit of the person(s) requesting the hearing; the reasons for the request; and the issues proposed to be considered at the hearing.

Information on file for this permit action, including the draft permit, fact sheet and permit application, is accessible via e-mail by contacting the above-named permit drafter's e-mail address or the above-named basin engineer's email during normal business hours Monday through Friday (except holidays). Note that DNR staff have limited access to permit hard copy files during this time as they are working from home, but much of the permit file is available electronically by e-mail request. Permit information is also available on the internet at:

<http://dnr.wi.gov/topic/wastewater/PublicNotices.html>. Pursuant to the Americans with Disabilities Act, reasonable accommodation, including the provision of informational material in an alternative format, will be made to qualified individuals upon request.

NAME OF PUBLISHING NEWSPAPER: Daily Tribune

ADDRESS OF PUBLISHING NEWSPAPER: PO Box 8090, Wisconsin Rapids, WI 54495-8090

Date Notice Issued: Monday, April 12, 2021